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9 *Attorneys for Defendant, Nissan Motor Acceptance Company*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 **ROBERT JOHNSON JR.,**

13 Plaintiff,

14 v.

15 EXPERIAN INFORMATION SOLUTIONS,  
16 INC; BACKGROUNDCHECKS.COM LLC;  
17 CLARITY SERVICES, INC. and NISSAN-  
18 INFINITY LT LLC,

19 Defendants.

Case No.: 2:25-cv-01127-ART-EJY

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME**

**(SECOND REQUEST)**

20 Pursuant to Fed. R. Civ. P. 6(b) and L.R. 7.1(b), Defendant Nissan Motor Acceptance  
21 Company LLC, incorrectly plead as Nissan Infinity LT LLC (“NMAC”), by counsel, respectfully  
22 request a twenty-one (21) day enlargement of the time to respond to the Complaint of Plaintiff  
23 Robert Johnson Jr. in this action (“Plaintiff”). In support thereof, NMAC states:

24 1. On June 24, 2025, Plaintiff filed his Complaint in the Unites States District Court  
25 for the District of Nevada.

26 2. On or around June 26, 2025, NMAC was served with the Complaint.

27 3. NMAC’s deadline to respond to the Complaint is August 14, 2025, and as such  
28 has not yet passed.

4. NMAC respectfully requests a twenty-one (21) day extension of time, through and  
including September 4, 2025, to respond to Plaintiff’s Complaint.

1           5.       Good cause exists for the requested extension. NMAC's counsel and Plaintiff's  
2 counsel are actively discussing resolution of this matter. In addition, the requested extension will  
3 allow additional time for counsel to possibly resolve this matter before filing a responsive  
4 pleading.

5           6.       This is the second motion to extend this deadline to respond to the Complaint  
6 sought by NMAC in this matter.

7           7.       This motion is made in good faith and not for purposes of undue delay. No party  
8 will be prejudiced by the relief sought.

9           8.       Counsel for Defendant conferred with Plaintiff regarding the extension of time  
10 requested herein, who confirmed that Plaintiff does not oppose the relief sought herein.

11           WHEREFORE, Defendant NMAC respectfully requests that the Court grant this  
12 Unopposed Motion and extend the time for NMAC to respond to the Complaint by and through  
13 September 4, 2025.  
14

15 Dated: August 7, 2025

16                   WRIGHT, FINLAY & ZAK, LLP

17                   /s/ Jory C. Garabedian

18                   Jory C. Garabedian, Esq.

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22  
23                   **ORDER**

24                   **IT IS SO ORDERED.**

25                   Raymond J. Zouchak  
26                   U.S. MAGISTRATE JUDGE

27                   Dated: August 7, 2025  
28